

EXHIBIT D

Maria L. Nixon

From: Molshree Gupta
Sent: Friday, June 23, 2023 4:00 PM
To: Thomas Ferlauto; Maria L. Nixon
Cc: Patrick Stockalper
Subject: RE: 610-2: Assiff, Joshua vs. County of Los Angeles, et al. / Deft's Ntc of Expert Deposition - Jeffrey J. Nobel

Well can Mr. Nobel at least provide a date so we can get something calendared?

We have previously provided dates for these witnesses many times, and you have imposed an unreasonable and arbitrary restriction that all PMK depositions must occur on the same day. Given the disparate categories and topics you have chosen to enumerate, that is not possible. We continue to want to work with you to provide the depositions – but they cannot all proceed on one day. The witnesses have disparate work schedules, as I am sure you know from having worked with law enforcement.

Please confirm whether you will withdraw your unreasonable and arbitrary restriction that all PMK depositions must occur on the same day.

Molshree Gupta
Partner
KJAR, McKENNA & STOCKALPER, LLP

From: Thomas Ferlauto <tmf@lawofficetmf.com>
Sent: Friday, June 23, 2023 11:10 AM
To: Maria L. Nixon <mnixon@kmslegal.com>
Cc: Patrick Stockalper <pstockalper@kmslegal.com>; Molshree Gupta <mgupta@kmslegal.com>
Subject: Re: 610-2: Assiff, Joshua vs. County of Los Angeles, et al. / Deft's Ntc of Expert Deposition - Jeffrey J. Nobel

The last time I spoke with Mr. Stockalper he requested to take Mr. Nobel's deposition off calendar, because he did not want to take Mr. Nobel's deposition until Mr. Nobel had an opportunity to review the depositions of Sergeant Kelly and the County representatives. Mr. Nobel has just been provided with Sergeant Kelly's transcript, and we are still waiting on your office for dates for the deposition of the County representatives.

LAW OFFICE OF
THOMAS M. FERLAUTO
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On Jun 22, 2023, at 2:51 PM, Maria L. Nixon <mnixon@kmslegal.com> wrote:

Good afternoon. Following up again regarding Mr. Nobel's availability in the afternoon of July 5 or 7. Kindly advise.

Thank you.

<image001.jpg>

Maria Nixon
Legal Assistant/Paralegal to
Molshree Gupta, Esq.
Carina M. Jordan, Esq.
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From: Maria L. Nixon

Sent: Wednesday, June 21, 2023 2:26 PM

To: Thomas Ferlauto <tmf@lawofficetmf.com>

Cc: Patrick Stockalper <pstockalper@kmslegal.com>; Molshree Gupta <mgupta@kmslegal.com>

Subject: RE: 610-2: Assiff, Joshua vs. County of Los Angeles, et al. / Deft's Ntc of Expert Deposition - Jeffrey J. Nobel

Dear Counsel:

We would like to get Mr. Nobel's deposition back on calendar.

Please advise if Mr. Nobel is available in the afternoon of July 5th or July 7th.

Sincerely,

<image001.jpg>

Maria Nixon

Legal Assistant/Paralegal to

Molshree Gupta, Esq.

Carina M. Jordan, Esq.

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From: Maria L. Nixon

Sent: Monday, May 15, 2023 4:32 PM

To: Thomas Ferlauto <tmf@lawofficetmf.com>

Cc: Patrick Stockalper <pstockalper@kmslegal.com>; Molshree Gupta <mgupta@kmslegal.com>

Subject: RE: 610-2: Assiff, Joshua vs. County of Los Angeles, et al. / Deft's Ntc of Expert Deposition - Jeffrey J. Nobel

Dear Counsel:

Attached please find our below documents in the above matter.

- Amended Notice of Deposition of Expert Jeffrey Nobel

Thank you,

<image001.jpg>

Maria Nixon

Legal Assistant/Paralegal to

Molshree Gupta, Esq.

Carina M. Jordan, Esq.

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From: Thomas Ferlauto <tmf@lawofficetmf.com>

Sent: Monday, May 15, 2023 12:31 PM

To: Maria L. Nixon <mnixon@kmslegal.com>

Subject: Re: 610-2: Assiff, Joshua vs. County of Los Angeles, et al. / Deft's Ntc of Expert Deposition - Jeffrey J. Nobel

Yes. June 1 will work.

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On May 15, 2023, at 10:23 AM, Maria L. Nixon <mnixon@kmslegal.com> wrote:

Dear Counsel:

We would like to schedule Mr. Nobel's deposition on June 1, 2023 at 10:00 a.m.

If there are no objections, I will re-notice his deposition.

Regards,

<image001.jpg>

Maria Nixon
Legal Assistant/Paralegal to
Molshree Gupta, Esq.
Carina M. Jordan, Esq.
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From: Thomas Ferlauto <tmf@lawofficetmf.com>

Sent: Friday, May 12, 2023 9:07 AM

To: Maria L. Nixon <mnixon@kmslegal.com>

Cc: Patrick Stockalper <pstockalper@kmslegal.com>; Molshree Gupta <mgupta@kmslegal.com>

Subject: Re: 610-2: Assiff, Joshua vs. County of Los Angeles, et al. / Deft's Ntc of Expert Deposition - Jeffrey J. Nobel

Counsel:

Mr. Nobel is already scheduled for a deposition in another case on May 31. He is available on May 29 and 30 as well as June 1 and 2.

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On May 11, 2023, at 3:15 PM, Maria L. Nixon <mnixon@kmslegal.com> wrote:

Dear Counsel:

Attached please find our below documents in the above matter.

- Deft's Ntc of Expert Deposition - Jeffrey J. Nobel

Thank you,

<image001.jpg>

Maria Nixon
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<Deft's Ntc of Expert Deposition - Jeffrey J. Nobel.PDF>